

*10/31/2007*

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

NANCI FELDMAN Plaintiff,

7 cv 06337 (VM)

- against -

BOLIVIAN INVESTORS Defendant.  
 GROUP, INC.

**MOTION TO ADMIT COUNSEL**

**PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the  
 Southern and Eastern Districts of New York, I, *Charles E. Dorkey III* a member in good standing of  
 the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: GLEN FRANKLIN KOONTZ  
 Firm Name: MARTIN & SEIBERT, L.C.  
 Address: 1453 WINCHESTER AVE  
 City/State/Zip: MARTINSBURG, WV 25405  
 Phone Number: (304) 267-8985  
 Fax Number: (304) 267-0731

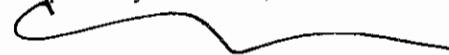
GLEN FRANKLIN KOONTZ is a member in good standing of the Bar of the States of  
 VIRGINIA, MARYLAND, DISTRICT OF COLUMBIA, CALIFORNIA, and WEST VIRGINIA

There are no pending disciplinary proceeding against GLEN FRANKLIN KOONTZ  
 in any State or Federal court.

Dated: *October 26, 2007*

City, State: *New York, New York*

Respectfully submitted,

  
 Sponsor's  
 SDNY Bar CD-8422

Firm Name: McKenna Long & Aldridge LLP  
 Address: 230 Park Avenue, Suite 1700  
 City/State/Zip: New York, New York 10169  
 Phone Number: 212. 905. 8300  
 Fax Number: 212. 922. 1819

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FILED  
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 U.S. DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK

NANCI FELDMAN

Plaintiff,

v.

07 cv 6337 (VM)

BOLIVIAN INVESTORS GROUP,  
INC. Defendant.

AFFIDAVIT OF  
*Charles E. Dorkey III*  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

State of New York )  
                      )  
                      ss:  
County of New York )

*Charles E. Dorkey III*, being duly sworn hereby deposes and says as follows:

1. I am counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Glen Franklin Koontz as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the **State of New York**, and was admitted to practice law in *October 6, 1975*. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.
3. I have known Glen Koontz since 2007.
4. Mr. Koontz is an attorney at Martin & Seibert, L.C. in Martinsburg, West Virginia.
5. I have found Mr. Koontz to be a skilled attorney and person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Glen Franklin Koontz, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Glen Franklin Koontz, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Glen Franklin Koontz, pro hac vice, to represent the defendant in the above captioned matter, be granted.

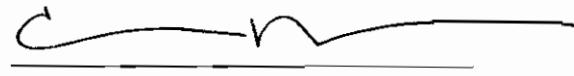
Dated: *October 26, 2007*

City, State: *New York, New York*

Notarized: *Rabert M. Michael Gee*

**ROBERT MICHAEL GEE**  
Notary Public, State of New York  
Reg No. #01GE6127971  
Qualified in New York County  
Commission Expires June 6, 2009

Respectfully submitted,



SDNY Bar Code: CD-8422

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NANCI FELDMAN

Plaintiff,

7 cv 06337 (VM)

- against -

BOLIVIAN INVESTORS  
GROUP, INC.

Defendant.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of *Charles E. Dailey III*, attorney for BOLIVIAN INVESTORS GROUP, INC.  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name:	GLEN FRANKLIN KOONTZ
Firm Name:	MARTIN & SEIBERT
Address:	1453 WINCHESTER AVENUE
City/State/Zip:	MARTINSBURG, WV 25405
Telephone/Fax:	(304) 267-8985
Email Address:	gfkoontz@martinandseibert.com

is admitted to practice pro hac vice as counsel for BOLIVIAN INVESTORS GROUP, INC in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State:

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United States District/Magistrate Judge

*STATE OF WEST VIRGINIA*

*I, Edythe A. Nash, Deputy Clerk of the Supreme Court of Appeals of West Virginia, hereby do certify that Glen Franklin Koontz, of Martinsburg, West Virginia, an attorney duly licensed to practice law in this State, was admitted to practice law before the Supreme Court of Appeals of West Virginia, the highest court of the State, on the 9th day of November, 2004, that he is an attorney in good standing in said Court and is currently on active status and that his private and professional characters are good.*

*Given under my hand and seal of said Court, at Charleston, West Virginia, this 18th day of October, 2007, and in the 145<sup>th</sup> year of the State.*

*Edythe A. Nash*  
\_\_\_\_\_  
*Deputy Clerk, Supreme Court of Appeals of West Virginia*



# Supreme Court of Virginia

AT RICHMOND

## Certificate

I, Patricia L. Harrington, Clerk of the Supreme Court of Virginia,  
do hereby certify that

GLEN FRANLIN KOONTZ

was admitted to practice as an attorney and counsellor at the bar of this Court on  
October 20, 1987.

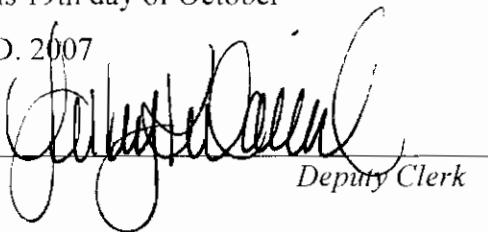
I further certify that so far as the records of this office are  
concerned, GLEN FRANLIN KOONTZ is a member of the bar of this Court  
in good standing.

**Witness** my hand and seal of said Court

This 19th day of October

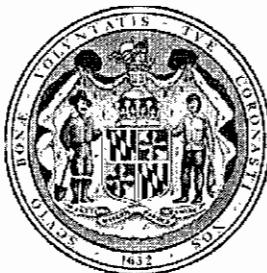
A.D. 2007

By:



Patricia L. Harrington  
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the fourteenth day of June, 1989,*

**Glen Franklin Koontz**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
eighteenth day of October, 2007.*

Alexander L. Cummings  
Clerk of the Court of Appeals of Maryland



**Supreme Court of California**

FREDERICK K. OHLRICH

*Clerk of the Court*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE  
STATE OF CALIFORNIA**

**GLEN FRANKLIN KOONTZ**

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that GLEN FRANKLIN KOONTZ was on the 4TH day of DECEMBER 2000, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court,  
this 19th day of OCTOBER, 2007.*

**FREDERICK K. OHLRICH**

*Clerk of the Supreme Court*

By \_\_\_\_\_ Joseph Cornetta  
*Joseph Cornetta, Deputy Clerk*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

J. GARLAND PINKSTON, JR., Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

GLEN FRANKLIN KOONTZ

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was on the 26<sup>th</sup> day of AUGUST, 1988

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on October  
22, 2007.

GARLAND PINKSTON, JR., CLERK

By: GARLAND PINKSTON  
Deputy Clerk

10/31/2007

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
NANCI FELDMAN, :  
Plaintiff. : Civil Action No. 1:07-CV-06337  
: (VM)  
: - vs. -  
:  
BOILIVIAN INVESTORS GROUP, INC., : AFFIDAVIT OF SERVICE  
Defendant. :  
----- X

STATE OF NEW YORK )  
 ) ss:  
COUNTY OF NEW YORK )

ROBERT GEE, being duly sworn, deposes and says that deponent is not a party to the action, is over 18 years of age and is employed by McKenna Long & Aldridge LLP.

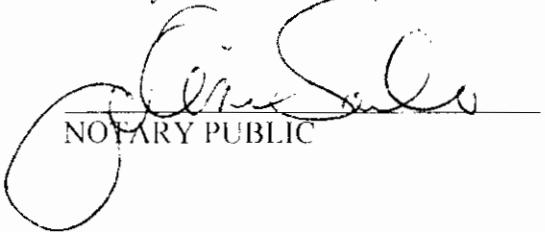
That on the 29<sup>th</sup> day of October, 2007, deponent served, by U.S. Mail, a true and correct copy of Defendant Bolivian Investors Group, Inc's **Motion to Admit Counsel, Glen Franklin Koontz, Pro Hac Vice; Affidavit of Charles E. Dorkey III in Support of Motion to Admit Counsel Pro Hac Vice; Certificates of Good Standing for Glen Franklin Koontz from the Bar of the States of Virginia, Maryland, California, West Virgina, and the District of Columbia; and Proposed Order for Admission Pro Hac Vice on Written Motion** upon the following:

Donald C. Moss, Esq.  
Moss & Moss LLP  
127 East 26<sup>th</sup> Street  
New York, New York 10010

the address designated by said attorney for that purpose, by depositing the same enclosed in a postage pre-paid envelope in a post office official depository under the exclusive care and custody of the United States Postal service within the State of New York.

Rabt See

Sworn to before me this  
29<sup>th</sup> day of October, 2007

  
NOTARY PUBLIC

JOANNE SARLO  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01SA4831775  
Qualified in Kings County  
Commission Expires 8/31/2009